



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IX

75 Hawthorne Street  
San Francisco, CA 94105-3901

APR 12 2010

Bob Ross  
Field Manager  
Las Vegas Field Office  
Bureau of Land Management  
4701 North Torrey Pines Drive  
Las Vegas, NV 89130-2301

Subject: Draft Supplemental Environmental Impact Statement (DSEIS) for Upper Las Vegas Wash Conservation Transfer Area, Las Vegas, Nevada (CEQ# 20100009)

Dear Mr. Ross:

The Environmental Protection Agency (EPA) has reviewed the above-referenced document pursuant to the National Environmental Policy Act (NEPA), Council on Environmental Quality (CEQ) regulations (40 CFR Parts 1500-1508), and our NEPA review authority under Section 309 of the Clean Air Act.

We have rated Alternative B, the Preferred Alternative, as Lack of Objections (LO) because this alternative keeps the natural functions and hydrology of the Upper Las Vegas Wash (ULVW) intact, preserves sensitive resource values, and provides opportunities for recreation, education, and research. EPA supports the selection of Alternative B as the preferred alternative. This alternative appears to be fully consistent with the authorizing legislation, the Southern Nevada Public Lands Management Act (SNPLMA), and its mandate to promote the preservation of natural, scientific, aesthetic, historical, cultural, watershed, wildlife and other values; enhance recreational opportunities and public access; and provide the opportunity to achieve better management of public land through consolidation of Federal ownership.

We note that Alternatives C through E and the No Action Alternative would disrupt the natural functions of the ULVW by allowing development that could disrupt waters flowing down Sheep and Las Vegas ranges, upper alluvial fans, and in the active wash channel (p. 16). These alternatives would significantly increase sediment loss, increase peak flows and associated erosion, requiring modifications to infrastructure to accommodate large flood events, and the construction of flood control structures that are likely to have considerable alterations to the shape, depth, and channelization of the ULVW (p. 130). These alternatives would also have significant adverse impacts due to the loss of high-potential or occupied habitat for sensitive

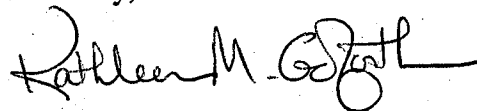
vegetation species (p. 135) and the increased potential for removing or burying significant cultural or paleontological deposits (p. 128).

DSEIS maps show many parcels of Bureau of Land Management land within the urbanized Las Vegas Valley area which could be disposed to accommodate the needs of future urban growth and development. EPA advocates smart growth principles in development planning where development serves the economy, community, and the environment. We urge the Bureau of Land Management and the Las Vegas Valley communities to design development to minimize air quality impacts and to preserve watershed functions and water quality by considering increased density in development plans; preserving large, continuous open space areas; preserving wetlands, floodplains, riparian corridors, and other critical ecological areas; and minimizing overall land disturbance and impervious surface associated with development.

We recommend the Final SEIS contain additional information on monitoring and enforcement measures that will be implemented within the final ULVW Conservation Transfer Area boundary to assure avoidance and minimization of adverse impacts from Off-Highway Vehicle users, fossil hunters, feral pets, hikers, bicyclists, and increased public visitation afforded by increased access. A map illustrating frequently referenced sites and infrastructure, such as the Decatur Detention Dam, Eglington Preserve, and east-west diversion berm, would be helpful in providing and understanding of the physical and land use context of the proposed Conservation Transfer Area boundary.

We appreciate the opportunity to provide comments on the DSEIS. Please send one hard copy and one CD of the Final SEIS to the address above (mail code: CED-2) at the same time it is officially filed with our Washington D.C. Office. If you have any questions, please contact me at (415) 972-3521, or contact Laura Fujii, the lead reviewer for this project. Laura can be reached at (415) 972-3852 or [fujii.laura@epa.gov](mailto:fujii.laura@epa.gov).

Sincerely,

A handwritten signature in black ink, appearing to read "Kathleen M. Goforth". The signature is fluid and cursive, with the first name "Kathleen" being more prominent.

Kathleen M. Goforth, Manager  
Environmental Review Office  
Communities and Ecosystems Division